



INDICTMENT FOR CONSPIRACY TO COMMIT THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS, CONSPIRACY TO COMMIT WIRE FRAUD, WIRE FRAUD AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

* CRIMINAL NO.

v.

* SECTION:

AARON P. BROUSSARD KAREN PARKER

a/k/a Karen Parker Broussard THOMAS G. WILKINSON * VIOLATION: 18 U.S.C. § 371

18 U.S.C. § 666(a)(1)(A)

18 U.S.C. § 1343

18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNT 1

CONSPIRACY TO COMMIT WIRE FRAUD AND THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

1. Beginning in 1992, defendant KAREN PARKER, a/k/a Karen Parker Broussard,

began working as an administrative assistant for the Jefferson Parish Council.

- 2. On or about July 31, 2003, defendant KAREN PARKER, resigned from her position as an administrative assistant for Jefferson Parish Councilman and defendant AARON P.

 BROUSSARD and began working for defendant AARON P. BROUSSARD's campaign for Parish President.
- 3. On or about October 4, 2003, defendant **AARON P. BROUSSARD** was elected Parish President of Jefferson Parish. On or about October 20, 2007, defendant **AARON P. BROUSSARD** was re-elected by the voters of Jefferson Parish.
- 4. As Parish President, defendant **AARON P. BROUSSARD** was the chief administrative officer of the parish and was responsible for the administration and supervision of all parish departments, offices, agencies, and special districts. **BROUSSARD** also had the power to appoint and remove all administrative officers and employees responsible to him. In addition, **BROUSSARD** had discretion to authorize parish department heads responsible to him to appoint and remove subordinate employees in those departments.
- 5. On or about December 8, 2003, **AARON P. BROUSSARD** retained **THOMAS G. WILKINSON** as the Parish Attorney for Jefferson Parish for which **WILKINSON** was paid \$100,000.00 per year. **WILKINSON** held the position of Parish Attorney for Jefferson Parish since 1996.
- 6. As the Parish Attorney for Jefferson Parish, defendant **THOMAS G. WILKINSON** had supervisory authority over, among others, the Jefferson Parish Attorney's Office, the authority to approve the hiring of new employees, and the authority to approve pay raises for Parish Attorney's Office employees.

- 7. As Parish Attorney, defendant **THOMAS G. WILKINSON** was an unclassified employee appointed by Parish President and defendant **AARON P. BROUSSARD** and, therefore, served at the pleasure of and reported directly to **BROUSSARD**.
- 8. **THOMAS G. WILKINSON** also operated an outside legal practice during his term as Parish Attorney for Jefferson Parish.
- 9. On or about October 28, 2003, defendant **THOMAS G. WILKINSON** approved the rescission/cancellation of **KAREN PARKER's** July 31, 2003 resignation from Jefferson Parish employment.
- 10. On or about November 13, 2003, defendant **THOMAS G. WILKINSON** approved the placing of **KAREN PARKER** on leave without pay for the time period August 1, 2003, through on or about October 28, 2003, thereby eliminating any break in her employment with Jefferson Parish.
- 11. Jefferson Parish provides for longevity pay raises for employees. Employees receive a step for every three years of employment after they have completed seven years of continuous employment with Jefferson Parish. Employees receive an additional five percent compounded increase in their salary for each eligible step.
- 12. Jefferson Parish employees with at least two years of continuous employment may also receive tenure awards if funding permits. These tenure awards are calculated by multiplying the number of years of employment with Jefferson Parish by \$25.00.
- 13. Jefferson Parish employees with less than five years employment experience earn approximately 3.5 hours of annual leave every two weeks. Employees with five to ten years experience earn approximately 4.38 hours of annual leave every two weeks. An employee who has

worked for Jefferson Parish for more than ten years is placed in the maximum leave category and earns approximately 5.25 hours of annual leave every two weeks.

- 14. When an employee resigns or retires from Jefferson Parish and is then re-hired at a later time, that employee must wait at least 90 days before they are eligible for health insurance benefits.
- 15. On or about May 29, 2004, defendant **KAREN PARKER** and defendant **AARON**P. BROUSSARD were married.
- 16. On or about October 28, 2003, defendant **KAREN PARKER** was given the position of Paralegal Supervisor in the Jefferson Parish Attorney's Office. Her starting salary was approximately \$48,000.00.
- 17. The salary range for the position of Paralegal Supervisor for 2003 was approximately \$28,838.00 to \$44,737.00 according to the Executive Pay Plan for Jefferson Parish.
- 18. According to the job description of Paralegal Supervisor, the essential functions of that position require that the "[i]ndividual conducts basic legal research, interviews witnesses, meets with inter-governmental personnel and members of the public, gathers evidence to formulate the Parish's position on Parish or other matters. Individual prepares legal documents including pleadings, wills, contracts, leases, property descriptions and legal opinions setting forth the Parish's position on Parish and other matters. Individual supervises and coordinates the activities of various support staff."
- 19. The Paralegal Supervisor position is an unclassified position and, therefore, applicants are not required to take a civil service examination nor are unclassified employees subject to the

same annual Employment Performance Evaluation process that classified employees are required to undergo.

- 20. The Jefferson Parish job description for the position of Parish Attorney's Office Paralegal Supervisor required Paralegal Supervisors to have completed paralegal training and certification.
- 21. Defendant **KAREN PARKER** was not trained as a paralegal or a paralegal supervisor nor did she possess the required paralegal certification.
- 22. The salary range for the position of Paralegal Supervisor for 2007 2010 was approximately \$36,071.00 \$50,756.00 according to the Executive Pay Plan for Jefferson Parish.
- 23. On or about March 8, 2004, defendant **KAREN PARKER** was assigned to work for ID Management which was located at the East Bank Regional Library.
- 24. ID Management is the department responsible for issuing access badges to Jefferson Parish employees and operated independent of the Parish Attorney's Office.
- 25. Jefferson Parish determined that the Parish only requires one employee to hold the position of ID/Security System Coordinator.
- 26. The salary range for the parish employee with the position of ID/Security System Coordinator, who was located at the East Bank Regional Library, and was responsible for the issuance of Jefferson Parish employee access badges, was approximately \$24,297.00 \$37,693.00 for the years 2004 2006 and was approximately \$30,533.00 \$42,963.00 for the years 2007 2010.
- 27. Despite her transfer to ID Management located at the East Bank Regional Library, defendant **KAREN PARKER** retained her job title and higher salary of Paralegal Supervisor until her dismissal on or about February 5, 2010.

- 28. Defendant **KAREN PARKER** did not perform any of the duties of a Paralegal Supervisor while assigned to ID Management at the East Bank Regional Library.
- 29. Under the title Paralegal Supervisor for Jefferson Parish, defendant **KAREN PARKER** was paid approximately \$323,308.13 for the years 2004-2010.
- 30. Jefferson Parish utilized Iberia Bank, formerly Omni Bank, for Automated Clearing House transactions (payroll) that transmitted, via wire, these payroll transactions that crossed state lines before the payroll funds were deposited into the recipient (employee) bank account.
- 31. **KAREN PARKER** established direct deposit with the Jefferson Parish Employees Federal Credit Union (JPEFCU) and as a result her salary under the title Paralegal Supervisor was deposited into her JPEFCU accounts.
- 32. The Jefferson Parish Attorney's Office and ID Management are both agencies of Jefferson Parish.
- 33. Jefferson Parish received federal assistance in excess of \$10,000.00 during each of the one year periods beginning on January 1st and ending December 31st for the years 2004, 2005, 2006, 2007, 2008, 2009, and 2010.

B. THE SCHEME TO DEFRAUD

Beginning on or about July 31, 2003, and continuing to on or about February 5, 2010, in the Eastern District of Louisiana and elsewhere, defendants **AARON P. BROUSSARD, KAREN PARKER**, and **THOMAS G. WILKINSON**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and/or property from Jefferson Parish, to wit: approximately \$410,463.00, by means of false pretenses, promises and representations thereby defrauding Jefferson Parish and its citizens of money and property.

It was further a part of the scheme and artifice to defraud that defendants **AARON P. BROUSSARD, KAREN PARKER** and **THOMAS G. WILKINSON**, used the Parish Attorney's Office and ID Management, and allowed the Parish Attorney's Office and ID Management to personally enrich **AARON P. BROUSSARD** and **KAREN PARKER** with taxpayer funds.

It was further a part of the scheme and artifice to defraud that defendants AARON P. BROUSSARD and THOMAS G. WILKINSON used their influence and positions in Parish government to make hiring decisions that were contrary to the best interest of the citizens of Jefferson Parish.

It was further a part of the scheme and artifice to defraud that defendants **AARON P. BROUSSARD** and **THOMAS G. WILKINSON** awarded **KAREN PARKER** with the job title of Paralegal Supervisor and allowed her to retain that position for over six years thereby allowing her to collect over \$323,000.00 in taxpayer funds knowing that she was neither qualified nor performing the job of Paralegal Supervisor.

It was further a part of the scheme and artifice to defraud that on or about October 28, 2003, defendant **THOMAS G. WILKINSON**, approved the appointment of defendant **KAREN PARKER** to the position of Paralegal Supervisor in the Parish Attorney's Office knowing that she was unqualified for the position of Paralegal Supervisor and knowing that she was romantically involved with president-elect **AARON P. BROUSSARD**.

It was further a part of the scheme and artifice to defraud that on or about October 28, 2003, defendant **THOMAS G. WILKINSON** rescinded the July 31, 2003 resignation of defendant **KAREN PARKER** thereby allowing her to collect additional money and salary in the form of longevity pay, tenure awards, health insurance benefits, and annual leave.

It was further a part of the scheme and artifice to defraud that on or about October 28, 2003, defendant **THOMAS G. WILKINSON** directed a subordinate employee to cross out the pay rate for defendant **KAREN PARKER** of \$28,838.00 and write \$48,000.00 on an official Parish of Jefferson, Department of Human Resources, Request to Fill a Vacant Job form.

It was further a part of the scheme and artifice to defraud that when defendant **THOMAS G.**WILKINSON approved the hiring of defendant **KAREN PARKER** as a Paralegal Supervisor, the position was not advertized publicly nor was defendant **KAREN PARKER** required to take a civil service examination because the position was an unclassified position.

It was further a part of the scheme and artifice to defraud and known to **THOMAS G.**WILKINSON that defendant KAREN PARKER did not perform any of the "essential functions" as referenced in the job description for the position of Paralegal Supervisor.

It was further a part of the scheme and artifice to defraud that in or about December 2003, defendant **AARON P. BROUSSARD** retained **THOMAS G. WILKINSON** as Parish Attorney for Jefferson Parish, a position that paid approximately \$100,000.00 per year.

It was further a part of the scheme and artifice to defraud that on or about March 8, 2004, defendant **THOMAS G. WILKINSON** approved the location transfer of defendant **KAREN**PARKER from the Parish Attorney's Office to ID Management located at the East Bank Regional Library.

It was further a part of the scheme and artifice to defraud that in 2004, 2007, and twice in 2008, defendant **THOMAS G. WILKINSON** approved Annual Evaluation Pay Raises for defendant **KAREN PARKER** that increased her annual salary.

It was further a part of the scheme and artifice to defraud that in 2004, 2005, three times in 2007, 2008, and 2009, defendant **AARON P. BROUSSARD** approved salary increases for defendant **THOMAS G. WILKINSON** that increased his annual salary.

It was further a part of the scheme and artifice to defraud and to conceal the scheme and artifice to defraud that on or about January 30, 2008, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation on a financial document that listed **KAREN PARKER's** position as a paralegal and which was faxed from the Parish President's Office.

It was further a part of the scheme and artifice to defraud that in or about the fall of 2008, defendant **THOMAS G. WILKINSON** attempted to use his position and perceived influence as a board member for an all boys New Orleans catholic school to assist **AARON P. BROUSSARD's** family member during the competitive admission process for that same school.

It was further a part of the scheme and artifice to defraud that during the five year period of 2004 - 2009, defendant **AARON P. BROUSSARD** authorized pay raises for defendant **THOMAS**G. WILKINSON that increased WILKINSON's salary from approximately \$100,000.00 to approximately \$184,000.00, knowing that this would result in an increased retirement benefit to WILKINSON.

It was further a part of the scheme and artifice to defraud that during the five year period of 2004 - 2009, defendant **THOMAS G. WILKINSON** authorized pay raises that increased **KAREN PARKER's** salary from approximately \$46,439.99 to approximately \$63,898.36, knowing that this would result in an increased retirement benefit to **PARKER**.

It was further a part of the scheme and artifice to defraud and in an effort to conceal the scheme and artifice to defraud that on or about April 28, 2009, defendant AARON P.

BROUSSARD caused a fax to be transmitted to defendant THOMAS G. WILKINSON that falsely attempted to describe defendant KAREN PARKER's position with ID Management.

It was further a part of the scheme and artifice to defraud and in an effort to conceal the scheme and artifice to defraud that on or about May 5, 2009, defendant **AARON BROUSSARD** made false statements when answering questions about his wife's occupation, job description, and nature of services rendered pursuant to her employment when he executed a sworn Personal Financial Disclosure Statement that was filed with the Louisiana Board of Ethics.

It was further a part of the scheme and artifice to defraud and in an effort to conceal the scheme and artifice to defraud that defendants **AARON P. BROUSSARD** and **KAREN PARKER** made repeated false representations about **PARKER's** occupation on official U.S. government documents.

C. THE CONSPIRACY

Beginning on or about July 31, 2003, and continuing to on or about February 5, 2010, in the Eastern District of Louisiana and elsewhere, the defendants, AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, did knowingly and willfully combine, conspire, and agree together and with each other to:

- 1. Embezzle, steal, and obtain by fraud, property valued at \$5,000 or more and owned by or under the care, custody, and control of the Parish of Jefferson; in violation of Title 18, United States Code, Section 666(a)(1)(A).
- 2. Use and cause to be used bank wire transfers to be transmitted by means of wire communication in interstate commerce the signals and sounds in furtherance of the scheme and

artifice to defraud as set forth in Part B of Count 1; in violation of Title 18, United States Code, Section 1343.

D. <u>OVERT ACTS</u>

On or about the following dates, in furtherance of the conspiracy and to accomplish its purposes, the defendants, AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

- 1. On or about October 28, 2003, defendant **THOMAS G. WILKINSON**, approved the appointment of defendant **KAREN PARKER** to the position of Paralegal Supervisor.
- 2. On or about October 28, 2003, defendant **THOMAS G. WILKINSON**, rescinded the July 31, 2003 resignation of defendant **KAREN PARKER**.
- 3. On or about October 28, 2003, defendant **THOMAS G. WILKINSON** directed a subordinate employee to cross out the pay rate for defendant **KAREN PARKER** of approximately \$28,838.00 and write \$48,000.00 on an official Parish of Jefferson, Department of Human Resources, Request to Fill a Vacant Job form.
- 4. In or about December 2003, defendant AARON P. BROUSSARD re-appointed THOMAS G. WILKINSON to the position of Parish Attorney for Jefferson Parish.
- 5. On or about March 8, 2004, defendant **THOMAS G. WILKINSON** approved the location transfer of defendant **KAREN PARKER** from the Parish Attorney's Office to ID Management located at the East Bank Regional Library, but allowed her to retain her Paralegal Supervisor title and salary.

- 6. On or about July 1, 2004, defendant **THOMAS G. WILKINSON** approved an Annual Evaluation Pay Raise for defendant **KAREN PARKER** that increased her annual salary of approximately \$51,789.00 to approximately \$54,378.00.
- 7. On or about July 6, 2004, defendant **AARON P. BROUSSARD** approved or directed a salary increase for defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$100,000.00 to approximately \$105,000.00.
- 8. Prior to on or about August 6, 2005, defendant **AARON P. BROUSSARD** approved or directed a salary increase for defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$105,000.00 to approximately \$107,625.00.
- 9. Prior to on or about January 6, 2007, defendant **AARON P. BROUSSARD** approved or directed the Chief Administrative Officer for Jefferson Parish to approve a salary increase for defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$107,625.00 to approximately \$116,235.00.
- 10. On or about June 22, 2007, defendant **AARON P. BROUSSARD** approved or directed the Chief Administrative Officer for Jefferson Parish to approve a salary increase for defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$116,235.00 to approximately \$122,047.00.
- 11. On or about June 25, 2007, defendant **THOMAS G. WILKINSON** approved an Annual Evaluation Pay Raise for defendant **KAREN PARKER** that increased her annual salary of approximately \$58,728.00 to approximately \$61,664.00.
- 12. On or about December 7, 2007, defendant **AARON P. BROUSSARD** approved or directed the Chief Administrative Officer for Jefferson Parish to approve a salary increase for

defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$122,047.12 to approximately \$134,251.75.

- 13. On or about January 30, 2008, defendants **AARON P. BROUSSARD** and **KAREN PARKER** faxed a personal financial statement from the Parish President's Office to a financial institution knowing that the mortgage application document falsely listed **PARKER's** position as a Paralegal.
- 14. On or about June 23, 2008, defendant **THOMAS G. WILKINSON** approved an Annual Evaluation Pay Raise for defendant **KAREN PARKER** that increased her annual salary of approximately \$61,664.00 to approximately \$61,778.00.
- 15. On or about July 1, 2008, defendant **THOMAS G. WILKINSON** approved an additional Annual Evaluation Pay Raise for defendant **KAREN PARKER** that increased her annual salary of approximately \$61,664.00 to approximately \$64,747.00.
- 16. On or about August 5, 2008, defendant **AARON P. BROUSSARD** approved or directed the Chief Administrative Officer for Jefferson Parish to approve a salary increase for defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$134,252.00 to approximately \$147,677.00.
- 17. In the Fall of 2008, defendant **THOMAS G. WILKINSON** attempted to use his position as a board member at an all boys New Orleans catholic school in order to assist one of **AARON P. BROUSSARD's** family members in the competitive admission process.
- 18. On or about February 6, 2009, defendant **AARON P. BROUSSARD** approved or directed the Chief Administrative Officer for Jefferson Parish to approve a salary increase for

- defendant **THOMAS G. WILKINSON** that increased his annual salary of approximately \$147,677.14 to approximately \$183,870.05.
- 19. On or about April 13, 2005, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 20. On or about November 11, 2006, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 21. On or about July 23, 2007, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 22. On or about April 9, 2008, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 23. On or about April 14, 2009, defendants **AARON P. BROUSSARD** and **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 24. On or about April 19, 2010, defendant **KAREN PARKER** made a false representation about **PARKER's** occupation on an official U.S. government document.
- 25. On or about April 28, 2009, defendant **AARON P. BROUSSARD** had a fax transmitted to defendant **THOMAS G. WILKINSON** that falsely attempted to describe defendant **KAREN PARKER's** position with ID Management.

26. On or about May 5, 2009, defendant **AARON BROUSSARD** made false statements when answering questions about his wife's occupation, job description, and nature of services rendered pursuant to her employment when he executed a sworn Personal Financial Disclosure Statement that was filed with the Louisiana Board of Ethics.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-28

WIRE FRAUD

- A. The allegations contained in Parts A and B of Count 1 are hereby re-alleged and incorporated herein by reference.
- B. On or about the dates listed below, in the Eastern District of Louisiana and elsewhere, the defendants, AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, THOMAS G. WILKINSON and others known and unknown to the grand jury, for the purpose of executing the scheme and artifice to defraud set forth in Part B of Count 1, caused the following bank wire transfers, among others, to be transmitted in interstate commerce, by means of a wire communication:

Count No.	Originating Bank	Recipient Bank	Wire Amount	Date of Wire Transfer
2	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,450.45	11/3/06
3	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,450.29	11/17/06

Count No.			Wire Amount	Date of Wire Transfer	
4	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,660.75	12/01/06	
5	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,450.29	12/15/06	
6	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,474.58	12/29/06	
7	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,615.09	10/05/07	
8	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,614.93	10/19/07	
9	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,615.09	11/02/07	
10	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,614.93	11/16/07	
11	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,654.05	11/30/07	

Count No.	Originating Bank	Recipient Bank	Wire Amount	Date of Wire Transfer	
12	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,615.09	12/14/07	
13	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,614.93	12/28/07	
14	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,675.76	10/03/08	
15	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,675.38	10/17/08	
16	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,729.93	10/31/08	
17	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$845.54	11/14/08	
18	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,675.38	11/26/08	
19	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,675.76	12/12/08	

Count No.	Originating Bank	Recipient Bank	Wire Amount	Date of Wire Transfer
20	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,675.38	12/23/08
21	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,700.98	09/18/09
22	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,701.45	10/02/09
23	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,700.98	10/16/09
24	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,756.86	10/31/09
25	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,701.45	11/13/09
26	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,700.98	11/25/09
27	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,701.45	12/11/09

Count No.	Originating Bank	Recipient Bank	Wire Amount	Date of Wire Transfer
28	Omni Bank	Karen A. Parker Jefferson Parish Employees Federal Credit Union Acct No.: 7080	\$1,700.98	12/23/09

all in violation of Title 18, United States Code, Section 1343.

COUNT 29

THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

- 1. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- 2. Beginning on or about January 1, 2006, and continuing to on or about December 31, 2006, in the Eastern District of Louisiana and elsewhere, defendants AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to the use of KAREN PARKER, wife of the Parish President AARON P. BROUSSARD, a person other than the rightful owner, property valued at \$5,000.00 or more and owned by, or under the care, custody, and control of Jefferson Parish, in that KAREN PARKER received thousands of dollars in income that she was not entitled to because she did not perform the essential duties of a Paralegal Supervisor and because she was paid substantially more than the individual who held the position of ID/Security System Coordinator.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT 30

THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

- 1. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- 2. Beginning on or about January 1, 2007, and continuing to on or about December 31, 2007, in the Eastern District of Louisiana and elsewhere, defendants AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to the use of KAREN PARKER, wife of the Parish President AARON P. BROUSSARD, a person other than the rightful owner, property valued at \$5,000.00 or more and owned by, or under the care, custody, and control of Jefferson Parish, in that KAREN PARKER received thousands of dollars in income that she was not entitled to because she did not perform the essential duties of a Paralegal Supervisor and because she was paid substantially more than the individual who held the position of ID/Security System Coordinator.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT 31

THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

- 1. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- 2. Beginning on or about January 1, 2008, and continuing to on or about December 31, 2008, in the Eastern District of Louisiana and elsewhere, defendants AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, did

knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to the use of **KAREN PARKER**, wife of the Parish President **AARON P. BROUSSARD**, a person other than the rightful owner, property valued at \$5,000.00 or more and owned by, or under the care, custody, and control of Jefferson Parish, in that **KAREN PARKER** received thousands of dollars in income that she was not entitled to because she did not perform the essential duties of a Paralegal Supervisor and because she was paid substantially more than the individual who held the position of ID/Security System Coordinator.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT 32

THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

- 1. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- 2. Beginning on or about January 1, 2009, and continuing to on or about December 31, 2009, in the Eastern District of Louisiana and elsewhere, defendants **AARON P. BROUSSARD**, **KAREN PARKER**, **a/k/a Karen Parker Broussard**, and **THOMAS G. WILKINSON**, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to the use of **KAREN PARKER**, wife of the Parish President **AARON P. BROUSSARD**, a person other than the rightful owner, property valued at \$5,000.00 or more and owned by, or under the care, custody, and control of Jefferson Parish, in that **KAREN PARKER** received thousands of dollars in income that she was not entitled to because she did not perform the essential duties of a Paralegal Supervisor

and because she was paid substantially more than the individual who held the position of ID/Security System Coordinator.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT 33

THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

- 1. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.
- 2. Beginning on or about January 1, 2010, and continuing to on or about December 31, 2010, in the Eastern District of Louisiana and elsewhere, defendants AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to the use of KAREN PARKER, wife of the Parish President AARON P. BROUSSARD, a person other than the rightful owner, property valued at \$5,000.00 or more and owned by, or under the care, custody, and control of Jefferson Parish, in that KAREN PARKER received thousands of dollars in income that she was not entitled to because she did not perform the essential duties of a Paralegal Supervisor and because she was paid substantially more than the individual who held the position of ID/Security System Coordinator.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

NOTICE OF WIRE FRAUD FORFEITURE

1. The allegations of Counts 1 through 28 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 371, 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

- 2. As a result of the offenses alleged in Counts 1 through 28, defendants, AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 371 and 1343, including but not limited to:
 - a. \$323,308.13 in United States Currency and all interest and proceeds traceable thereto.
 - b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.
- 3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

NOTICE OF FEDERAL PROGRAM FRAUD FORFEITURE

- 1. The allegations of Counts 1 and 29 through 33 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 371, 666 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).
- 2. As a result of the offenses alleged in Counts 1 and 29 through 33, defendants, AARON P. BROUSSARD, KAREN PARKER, a/k/a Karen Parker Broussard, and THOMAS G. WILKINSON, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 371 and 666, including but not limited to:
 - a. \$323,308.13 in United States Currency and all interest and proceeds traceable thereto.
 - b. The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.
- 3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 666 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

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New Orleans, Louisiana December 2, 2011